

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:
Yield10 Bioscience, Inc., *et al.*,¹
Debtors.

Chapter 11
Case No. 24-12752 (MFW)
(Jointly Administered)

NOTICE OF ENTRY OF APPEARANCE AND DEMAND FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that Mayer Brown LLP and Chipman Brown Cicero & Cole, LLP, hereby enter their appearance as counsel for and on behalf of ARE-MA Region No. 20, LLC (“ARE-MA”), pursuant to section 1109(b) of 11 U.S.C. §§ 101-1532 (as amended and applicable hereto, the “**Bankruptcy Code**”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) in the above-captioned bankruptcy cases (the “**Cases**”). Undersigned counsel further request, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the Cases be given and served upon the undersigned as follows:

Craig E. Reimer, Esquire
Kyle J. TumSuden, Esquire
MAYER BROWN LLP
71 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 782-0600
Email: creimer@mayerbrown.com
ktumsuden@mayerbrown.com

William E. Chipman, Jr., Esquire
Mark D. Olivere, Esquire
CHIPMAN BROWN CICERO & COLE, LLP
Hercules Plaza
1313 North Market Street, Suite 5400
Wilmington, Delaware 19801
Telephone: (302) 295-0191
Email: chipman@chipmanbrown.com
olivere@chipmanbrown.com

¹ The last four digits of the taxpayer identification numbers of the Debtors follow in parentheses: (i) Yield10 Bioscience, Inc. (x8289), (ii) Yield10 Bioscience Securities Corp. (x7435), and (iii) Yield10 Oilseeds Inc. (Canadian Business No. x9469).

PLEASE TAKE FURTHER NOTICE that this request for notice and service includes copies of all papers, including, but not limited to, reports, pleadings, motions, applications or petitions, schedules, plans, disclosure statements, and answering or reply papers filed in this case or any related adversary proceeding. Such service shall be by mailing one copy of each paper, unless otherwise directed by the Court, to the parties listed above.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any former or later pleading, claim, or suit shall waive (1) the right of ARE-MA to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “**District Court**”), (2) the right of ARE-MA to trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to these cases, (3) the right of ARE-MA to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, set-offs, or recoupments to which ARE-MA is or may be entitled under agreements in law or in equity.

Dated: December 12, 2024
Wilmington, Delaware

CHIPMAN BROWN CICERO & COLE, LLP

/s/ William E. Chipman, Jr.
William E. Chipman, Jr. (No. 3818)
Mark D. Olivere (No. 4291)
Hercules Plaza
1313 North Market Street, Suite 5400
Wilmington, Delaware 19801
Telephone: (302) 295-0191
Email: chipman@chipmanbrown.com
olivere@chipmanbrown.com

—and—

Craig E. Reimer
Kyle J. TumSuden
MAYER BROWN LLP
71 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 782-0600
Email: creimer@mayerbrown.com
ktumsuden@mayerbrown.com

Counsel for ARE-MA Region No. 20, LLC